

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

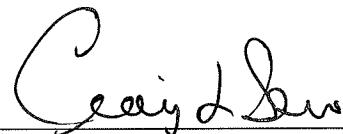
IN RE: **SLABBED NEW MEDIA, LLC**  
**Debtor**

**CHAPTER 11**  
**CASE NO. 15-50963-KMS**

**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via email transmission and/or U.S. Mail, postage prepaid, a true and correct copy of the *Second Motion to Extend Debtor's Time to Remove Causes of Action* (the "Motion") and the *Notice* in connection therewith (copies of which are attached hereto as collective **Exhibit "A"**) to all creditors and parties-in-interest as listed on the matrix on file with the Clerk of the Court (a copy of which is attached hereto as **Exhibit "B"**).

THIS, the 11<sup>th</sup> day of November, 2015.

  
\_\_\_\_\_  
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
Jarret P. Nichols; MSB No. 99426  
LAW OFFICES OF CRAIG M. GENO, PLLC  
587 Highland Colony Parkway  
Ridgeland, MS 39157  
601-427-0048 - Telephone  
601-427-0050 - Facsimile  
[cmgeno@cmgenolaw.com](mailto:cmgeno@cmgenolaw.com)  
[jnichols@cmgenolaw.com](mailto:jnichols@cmgenolaw.com)

N:\Firm Data\Users\Bankrupt\Slabbed New Media\Pleadings\COS - Motion to Extend Debtor's Time to Remove Pre-Pet Causes, Notice.wpd

IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: **SLABBED NEW MEDIA, LLC**  
**Debtor**

**CHAPTER 11**  
**CASE NO. 15-50963-KMS**

**NOTICE**

PLEASE TAKE NOTICE that Slabbed New Media, LLC (the “Debtor”) has filed a *Second Motion to Extend Debtor’s Time to Remove Causes of Action* (the “Motion”), a copy of which is attached hereto as **Exhibit “A”** and incorporated herein by reference.

PLEASE TAKE FURTHER NOTICE that all creditors and parties-in-interest wishing to object to the Application must file a written objection or other responsive pleading within 21 days from and after the date of this Notice, with the Clerk of the Court, Danny L. Miller, United States Bankruptcy Court, Southern District of Mississippi, Gulfport Division, at Dan M. Russell, Jr., U. S. Courthouse, 2012 - 15<sup>th</sup> Street, Ste. 244, Gulfport, MS 39501, with a copy to Craig M. Geno, Esq., counsel for the Debtors, at the Law Offices of Craig M. Geno, PLLC, 587 Highland Colony Parkway, Ridgeland, MS 39157.

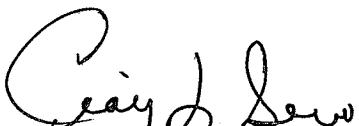
This, the 11<sup>th</sup> day of November, 2015.

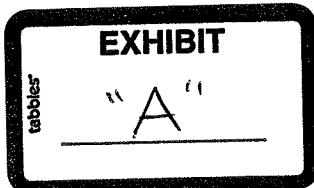
Respectfully submitted,

SLABBED NEW MEDIA, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By:   
\_\_\_\_\_  
Craig M. Geno



OF COUNSEL:

Craig M. Geno; MSB No. 4793  
Jarret P. Nichols; MSB No. 99426  
LAW OFFICES OF CRAIG M. GENO, PLLC  
587 Highland Colony Parkway  
Ridgeland, MS 39157  
601-427-0048 - Telephone  
601-427-0050 - Facsimile  
[cmgeno@cmgenolaw.com](mailto:cmgeno@cmgenolaw.com)  
[jnichols@cmgenolaw.com](mailto:jnichols@cmgenolaw.com)

N:\Firm Data\Users\Bankrupt\Slabbed New Media\Pleadings\Notice - Motion to Extend Debtor's Time to Remove Pre-Petition Cause of Action.wpd

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

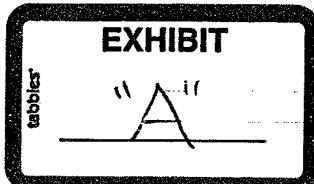
**IN RE:** **SLABBED NEW MEDIA, LLC**  
**Debtor**

**CHAPTER 11**  
**CASE NO. 15-50963-KMS**

**SECOND MOTION TO EXTEND DEBTOR'S  
TIME TO REMOVE CAUSES OF ACTION**

COMES NOW Slabbed New Media, LLC (the "Debtor"), and files this its *Second Motion to Extend Debtor's Time to Remove Causes of Action* (the "Motion"), and in support thereof, would show unto the Court the following, to-wit:

1. On June 16, 2015, the Debtor herein filed with this Court its Voluntary Petition for reorganization under Chapter 11 of the Bankruptcy Code.
2. In conjunction with this Chapter 11 case, the Debtor is aware that certain pre-petition claims may exist (and possibly post-petition claims as well), either directly or indirectly against the Debtor, that may need to be removed pursuant to Rule 9027 of the Federal Rules of Bankruptcy Procedure.
3. In order to fully protect the Debtor's rights regarding all pre-petition causes of action and/or claims (pending as of the filing of this Motion), and/or all post-petition claims, the Debtor respectfully seeks herein to extend the time for removing pre and post-petition causes of action pursuant to Rule 9027 an additional ninety sixty (60) days from November 15, 2015, up to and including January 14, 2016, so that Debtor can obtain local counsel with Court approval to remove out of state cases.
4. The Motion is in the best interest of all creditors and parties-in-interest and the extension sought herein is not sought for the purposes of unreasonable delay.
5. The Debtor submits that, in light of the relief requested, a Preliminary Order should be entered in the event objections are filed prior to the time a final hearing may be held on this matter.



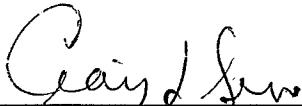
This, the 11<sup>th</sup> day of November, 2015.

Respectfully submitted,

SLABBED NEW MEDIA, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By:   
Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
Jarret P. Nichols; MSB No. 99426  
LAW OFFICES OF CRAIG M. GENO, PLLC  
587 Highland Colony Parkway  
Ridgeland, MS 39157  
601-427-0048 - Telephone  
601-427-0050 - Facsimile  
[cmgeno@cmgenolaw.com](mailto:cmgeno@cmgenolaw.com)  
[jnichols@cmgenolaw.com](mailto:jnichols@cmgenolaw.com)

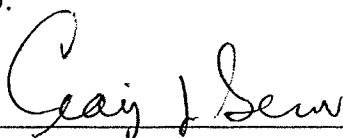
N:\Firm Data\Users\Bankrupt\Slabbed New Media\Pleadings\Second Motion to Extend Debtor's Time to Remove Pre-Petition Cause of Action.wpd

**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to:

Christopher J. Steiskal, Esq.  
Office of the United States Trustee  
[christopher.steiskel@usdoj.gov](mailto:christopher.steiskel@usdoj.gov)

This, the 11<sup>th</sup> day of November, 2015.

  
Craig M. Geno

Label Matrix for local noticing  
0538-6  
Case 15-50963-KMS  
Southern District of Mississippi  
Gulfport-6 Divisional Office  
Wed Nov 11 16:18:27 CST 2015

Chris E. Yount  
545 Terrace Street  
Jefferson, LA 70121-1515

Slabbed New Media, LLC  
Post Office Box 788  
Wiggins, MS 39577-0788

Connie S. Montgomery  
Montgomery Law Center  
1403 West Esplanade Avenue  
Kenner, Louisiana 70065-2850

U.S. Bankruptcy Court  
Dan M. Russell, Jr. U.S. Courthouse  
2012 15th Street, Suite 244  
Gulfport, MS 39501-2036

Daniel G. Abel  
Daniel G. Abel, Inc.  
2421 Clearview Pwy, Suite 106  
Metairie, LA 70001-1239

Douglas Handhoe  
110 Hall Street  
Wiggins, MS 39577-2623

(p) INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

Internal Revenue Service  
c/o United States Attorney  
1575 20th Avenue, 2nd Floor  
Gulfport, MS 39501-2040

Jack E. "Bobby" Truitt  
The Truitt Law Firm, LLC  
149 North New Hampshire Street  
Covington, LA 70433-3235

(p) MISSISSIPPI STATE TAX COMMISSION  
P O BOX 22808  
JACKSON MS 39225-2808

Tourism Business Solutions  
2308 Arnold Street  
Waveland, MS 39576-2643

Trout Point Lodge,  
Vaughn Perret and Charles Leary  
189 Trout Point Road  
East Kemptville, NS  
Canada B5A 5X9

U.S. Securities and Exchange Commission  
Office of Reorganization  
950 East Paces Ferry Road, Suite 900  
Atlanta, GA 30326-1382

U.S. Securities and Exchange Commission  
c/o United States U.S. Attorney  
1575 20th Avenue, 2nd Floor  
Gulfport, MS 39501-2040

United States Trustee  
501 East Court Street  
Suite 6-430  
Jackson, MS 39201-5028

Craig M. Geno  
Law Offices of Craig M. Geno, PLLC  
587 Highland Colony Pkwy.  
Ridgeland, MS 39157-8784

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Internal Revenue Service  
P.O. Box 21126  
Philadelphia, PA 19114

MS State Tax Commission  
Bankruptcy Section  
P.O. Box 23338  
Jackson, MS 39225

End of Label Matrix	
Mailable recipients	16
Bypassed recipients	0
Total	16

